

1 The Honorable Robert J. Bryan
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

9 C.P., by and through his parents, Patricia
10 Pritchard and Nolle Pritchard; and
11 PATRICIA PRITCHARD,

12 Plaintiffs,

13 v.

14 BLUE CROSS BLUE SHIELD OF
ILLINOIS,

15 Defendant.

16 NO. 3:20-cv-06145-RJB

17 DECLARATION OF PATRICIA
18 PRITCHARD IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASSWIDE
DECLARATORY AND PERMANENT
INJUNCTIVE RELIEF, AND AWARD OF
INDIVIDUAL NOMINAL DAMAGES TO
NAMED PLAINTIFFS

19 **Note on Motion Calendar:**
20 **March 3, 2023**

21 I, Patricia Pritchard, declare under penalty of perjury and in accordance with the
22 laws of the State of Washington and the United States that:

23 1. I am over the age of 18 and competent to testify to all matters stated herein.

24 All statements are made upon my personal knowledge.

25 2. I am the mother of C.P., the named plaintiff in the above captioned
26 litigation. He receives coverage of health benefits through the Catholic Health Initiatives
Medical Plan as administered by Blue Cross Blue Shield of Illinois ("BCBSIL") due to my
employment. C.P. received that health coverage for all times relevant to this litigation.

3. In the near future, C.P. intends to seek additional surgical gender-affirming
care as recommended by his medical providers including but not limited to a

1 hysterectomy. BCBSIL's continued administration of the gender affirming care
2 exclusion for Catholic Health Initiatives will result in a discrimination against C.P. and
3 others unless it is permanently enjoined.

4 4. I paid for \$12,122.50 in uncovered claims for C.P.'s chest surgery and
5 Vantas implant as a result of BCBSIL's administration of the Exclusion. Those are the
6 compensatory damages I seek in this litigation.

7 5. C.P.'s pre-service authorization was denied by BCBSIL based upon its
8 administration of the Exclusion. We appealed the pre-service denial, and that appeal
9 was also denied. A true and correct copy of the appeal of the pre-service denial was filed
10 at Dkt. No. 38-13 (redacted to protect C.P.'s identity), and a true and correct copy of
11 BCBSIL's denial of the appeal was filed at Dkt. No. 38-14 (similarly redacted).

12 6. I did not submit all of C.P.'s post-surgery claims for his chest surgery to
13 BCBSIL because it would have been futile to do so. Nonetheless, some or all of the claims
14 may have been submitted by C.P.'s provider.

15 DATED this 8 day of February, 2023, at Bremerton, Washington.

16 Patricia Pritchard

17 Patricia Pritchard

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